

EXHIBIT C

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

VERY REVEREND GEORGES F. de
LAIRE, J.C.L.,

Plaintiff,
v.

GARY MICHAEL VORIS, ANITA CAREY,
ST. MICHAEL'S MEDIA a/k/a CHURCH
MILITANT, and MARC BALESTRIERI

Defendants.

CIVIL ACTION NO. 1:21-cv-00131-JL

**[PROPOSED] ORDER CONCERNING TEMPORARY ATTACHMENT OF REAL
ESTATE SALES PROCEEDS**

At a hearing held in this matter on December 26, 2023, the parties, plaintiff Father Georges de Laire (“Fr. de Laire”), and the defendant, St. Michael’s Media a/k/a Church Militant (“Church Militant”), on the record, agreed to the following temporary attachment of the proceeds resulting from Church Militant’s anticipated sale of real estate, scheduled for December 29, 2023:

1. Church Militant shall escrow in a designated bank escrow account (“the Escrow Account”), and with proof to Fr. de Laire, all of the net proceeds from the closing of the upcoming sale of its’ properties located at 2900 Hilton Road and 2840 Hilton Road, Ferndale, Michigan as prejudgment security in this case.
2. Church Militant, at its earliest opportunity, but no later than five (5) business days from the date of this order, shall file with the Court an affidavit attesting to its’ monthly operating expenses as to which it seeks to have the Court permit payment from the Escrow Account. Church Militant shall provide the affidavit to counsel for Father de

Laire. Within three (3) business days, Fr. de Laire shall file any objections he may have to the payment from the Escrow Account of the proposed operating expenses.

3. The Court shall schedule a further hearing on the matter after Church Militant has retained new counsel. In the interim, the Court takes no action of Fr. de Laire's Motion to Attach with Notice [Docket No. 202].
4. This order shall remain in effect until further order of the Court.

SO ORDERED THIS __ DAY OF DECEMBER 2023.

The Honorable Judge Joseph N. Laplante
USDC NH

Dated: December __, 2023.

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